

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

IN RE: VALSARTAN, LOSARTAN, AND  
IRBESARTAN PRODUCTS LIABILITY  
LITIGATION,

MDL NO. 2875

HON. ROBERT B. KUGLER

THIS DOCUMENT RELATES TO:

*Paulette Silberman, et al. v. Solco  
Healthcare U.S., LLC, et al.,  
Case No. 1:19-cv-01612*

**AMENDED NOTICE OF VIDEOTAPED DEPOSITION OF  
PLAINTIFF PAULETTE SILBERMAN**

PLEASE TAKE NOTICE that, in accordance with Rule 30 of the Federal Rules of Civil Procedure and the Fact Witness Deposition Protocol in this case (Case Management Order No. 20, Dkt. 632), Defendant Hetero Drugs Ltd. and Hetero Labs Ltd. will take the deposition upon oral examination of Paulette Silberman on March 22, 2021 at 9:00 a.m. EST at Hill Wallack LLP, 21 Roszel Road, Princeton, NJ 08540. Please take further notice that: the deposition will be conducted remotely, using audio-visual conference technology; the court reporter will report the deposition from a location separate from the witness; counsel for the parties will be participating from various, separate locations; the court reporter will administer the oath to the witness remotely; and the witness will be required to provide government-issued identification satisfactory to the court reporter, and this identification must be legible on camera. The deposition shall be videotaped and recorded stenographically, and will continue from day to day until completed before a person duly authorized to administer oaths who is not counsel of record or interested in the events of this case. The attorney contact for the deposition is:

Eric Abraham, Esq.  
Hill Wallack LLP  
21 Roszel Road  
Princeton, NJ 08540  
(609) 924-0808  
eabraham@hillwallack.com

To the extent not previously produced, the deponent shall produce prior to or at the deposition the documents and tangible things listed on Exhibit A, attached hereto, that are in the deponent's possession, custody and control, including in the possession, custody or control of the deponent's attorney and/or other agents.

Date: March 18, 2021

Respectfully submitted,

/s/ Eric Abraham

Eric Abraham, Esq.  
Hill Wallack LLP  
21 Roszel Road  
Princeton, NJ 08540  
(609) 924-0808  
eabraham@hillwallack.com

*Attorney for Defendant Hetero Labs Ltd. And  
Hetero Drugs Ltd.*

**CERTIFICATE OF SERVICE**

I hereby certify that on this 19th day of March, 2021 a true and correct copy of the Amended Notice of Videotaped Deposition of Plaintiff Paulette Silberman was served upon the following via ECF, with copies to Counsel for Plaintiffs and all counsel of record by e-mail:

David Michael Estes, Esq.  
Mazie, Slater, Katz & Freeman  
103 Eisenhower Pkwy, Suite 207  
Roseland, NJ 07068  
destes@mskf.net

Conlee S. Whiteley  
Kanner & Whiteley, L.L.C.  
701 Camp Street  
New Orleans, LA 70130  
c.whiteley@kanner-law.com

/s/ Eric Abraham  
Eric Abraham, Esq.